

Exhibit 2

Nadine Lee Deposition

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

Case No. 1:18-cv-1046

HUI MINN LEE,

Plaintiff,

-vs-

MARKET AMERICA, INC.,

Defendant.

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December 4, 2020

9:37 a.m.

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DEPOSITION

TAKEN VIA VIDEO TELECONFERENCE

OF

HUI MINN LEE

- - - - -

1           Q     Okay. But no training, like actual  
2 training, you did was performed in the Taiwanese  
3 language?

4           A     No.

5           Q     Okay. Did you perform -- sorry, go ahead.

6           A     The official language in Taiwan is Mandarin,  
7 so that's why we all use Mandarin.

8           Q     Did you perform any of your job duties in  
9 Mandarin?

10          A     Yes.

11          Q     Tell me about those.

12          A     They are trainings that I've done for Taiwan  
13 market. Market Taiwan, that's what they call it. So  
14 that's quite frequent. And I also have to translate  
15 all the material that I -- I create in English to  
16 Chinese. And, also, if others had create training  
17 material, I have to translate that to Chinese and come  
18 down to the training with those material.

19          Q     Okay. So what language was training done  
20 for the Asian market? Would you do it in Mandarin  
21 for --

22          A     It -- it depends. If Taiwan market also  
23 involved in the same training, I might speak Mandarin  
24 and use English material because other country may not  
25 understand -- well, I say -- I will say all of them

1 A Yes.

2 Q Tell me about that.

3 A I came to the United States and attend  
4 Auburn University at Alabama.

5 Q And did you graduate with any degrees from  
6 Auburn?

7 A Yes. I got my master's degree of chemistry  
8 at Auburn.

9 Q Other than your B.S. and your master's, do  
10 you have any other schooling?

11 A I stay -- after I graduate and got my  
12 master's degree in Auburn, I stay about half year and  
13 enroll in the Ph.D. program.

14 Q Okay. Did you complete the Ph.D. program?

15 A No, I did not.

16 Q Okay. So how did you move from chemistry to  
17 becoming a coach or trainer?

18 A I -- after I quit my Ph.D. program, I start  
19 to raise my family. So I'm kind of leave that field  
20 until my son is about 12 years old. So that's when I  
21 decide to go back to work. So I -- I, basically, stay  
22 home for -- for quite a while to raise my kids.

23 Q And then when you went back to work, did you  
24 go straight to Market America?

25 A I -- yes.



1 Q Okay. What was your position there when you  
2 started?

3 A It's a franchise service rep.

4 Q Okay. Were you looking for kind of -- were  
5 you -- were you looking to change from kind of  
6 chemistry and that world to the business side, or how  
7 did you come to find Market America. Do you remember?

8 A I have a friend work there, and she -- she  
9 introduced me.

10 Q Do you remember who that was?

11 A She -- I haven't been in contact with her  
12 for quite a while.

13 Q Okay.

14 A And I -- I don't believe she's still here.  
15 I mean, she probably passed away. I heard she was  
16 sick and things like that.

17 Q I'm sorry to hear that. When you first came  
18 to Market America, the position you had, that was not  
19 in the training department?

20 A No, it was not.

21 Q Okay. How long did you stay in that  
22 position?

23 A I would say a little over a year maybe. I  
24 -- there is a post they are seeking for product  
25 information and computer core rep. And I applied for

1     that position.

2           Q     Okay. And did you get that position?

3           A     Yes, I did.

4           Q     All right. So when you moved to that  
5     position, what were your job responsibilities?

6           A     It's computer support. So if they have some  
7     difficulty in the computer area, we can help them, and  
8     also product information. Market America has a lot of  
9     different products, so a lot of customer need help on  
10    that area.

11          Q     Got it. Okay. So for kind of your first  
12    couple of years, you're working on the customer  
13    support side, right?

14          A     Correct.

15          Q     Okay. What was -- what was your next change  
16    in position at Market America that you remember?

17          A     The training department.

18          Q     Okay. How did you come to find that  
19    position?

20          A     I think in 2001 probably, they have a post  
21    that they want to hire a trainer. So I went there and  
22    applied, but I did not get the position. And another  
23    gentleman named Manny got the position. The year  
24    after -- I want to correct that. In 2001 that  
25    position posted. I did not get it. The second year

1 in 2002, I believe, that they have the same position  
2 post again. And I applied and compete with another  
3 lady in the distributors service, and I got that  
4 position.

5 Q Okay. At the time when you did not get that  
6 position in 2001, who did -- who did you interview  
7 with? Do you remember?

8 A Shawn Pegram.

9 Q I'm sorry. Who was that?

10 A Shawn -- Shawn Pegram. I cannot spell his  
11 last name. I cannot remember, but his name is Shawn  
12 Pegram.

13 Q Okay. And did you receive any sort of  
14 explanation or reason for why you were not given the  
15 position in 2001 in the training department?

16 A I'm not sure. I cannot remember whether or  
17 not I get anything.

18 Q Okay. All right. And so when you applied  
19 in 2002, you received that position at that time,  
20 right?

21 A Correct.

22 Q Okay.

23 A Yes.

24 Q Who did you interview with in 2002?

25 A Shawn Pegram, the same gentleman.

1     like.    So when were you next given a new title after  
2     you started in 2002?

3           A     It's until 2015, I will say, of -- the late  
4     2014.    That is when my title changed from trainer to a  
5     senior trainer.    So it's about, I think, 12 years  
6     roughly.

7           Q     Okay.   And, to your knowledge, there was no  
8     change in your title until you moved to senior  
9     trainer?

10          A     No.

11          Q     Okay.

12          A     No change.

13          Q     And between 2014 when you had that senior  
14     trainer title and when you left in 2017 -- or when you  
15     were terminated in 2017, were there any other changes  
16     in your job title?

17          A     Yes.

18          Q     Tell me about those.

19          A     That is the global training project manager.  
20     That's the title I had when I terminated.

21          Q     Okay.   When you started in the training  
22     department, there were -- how many trainers were there  
23     with you?

24          A     Two.

25          Q     So just you and Manny?

1 Amanda.

2 A Good.

3 Q Okay. Did you have any problems with her  
4 management style when she was your manager for 10  
5 years?

6 A I will say I complain to her few times that  
7 -- that Cherri did not -- well, I didn't mention  
8 Cherri, I should say. I say I have to always update  
9 the material and -- well, Cherri -- and that's --  
10 that's what I probably complain to her about that.

11 Q Okay. So you would -- you had complaints  
12 that you would bring to Amanda at times?

13 A Right, right.

14 Q Okay. And how would Amanda handle those  
15 complaints?

16 A She kind of agree with me, but there's no  
17 action taken.

18 Q Okay. And would you go back to her with  
19 additional concerns that nothing was being handled or  
20 how would you -- what would you do when you saw  
21 nothing being done?

22 A It's when -- well, I, basically, just do  
23 what I have to do and, you know, keeping my mouth shut  
24 most of the time because I -- I want, you know, my  
25 job. But the final straw was 2013, I would say -- the



1 about.

2 Q Why did you feel you needed a record of what  
3 you were talking about with Amanda in November of  
4 2013?

5 A Because I feel -- prior to that, I had been  
6 bringing it up and bringing it up and there's nothing  
7 done. So I think I probably need to make a record I  
8 really talk about this.

9 Q Who did you plan -- at the time -- at the  
10 time you decided to make a recording of this, who did  
11 you plan to share it with? And I'm talking about the  
12 2013 recording?

13 A I had -- I did not think I want to share it  
14 with anybody. Just for my -- me as a record at that  
15 time.

16 Q And what was -- what did you plan to do with  
17 that other recording once you had it in 2013?

18 A I don't know. I -- I cannot tell you in  
19 2013 what I was thinking back then. Back then the  
20 only thing I wanted to have is the record that I have  
21 this conversation with her, but I -- I did not think  
22 anything other than that.

23 Q Okay. So is it fair to say the recordings  
24 in 2013 were made just so you could go back and listen  
25 to the conversation and see what Amanda said she would

1 do?

2 A And, also, I want her to tell Liliana  
3 because back then Liliana already on boat. Over the  
4 years, she always tell me that she is empower me to  
5 direct Cherri to do things, but -- but that's never  
6 official. She never tell Cherri that I have  
7 authority, can direct her to do anything. So I was  
8 want her to make sure that she told Liliana that she  
9 is empowering me to direct her to -- you know, for her  
10 job.

11 Q So in 2013 you wanted Amanda to tell Cherri  
12 and Liliana that you could tell your --

13 A No.

14 Q -- other trainers what to do?

15 A No. Not Cherri.

16 Q Okay.

17 A Cherri already move away from -- well, her  
18 plan was move Cherri away from Market America  
19 training. But for me to take care of Market America  
20 portion of the training, she wanted Liliana to help  
21 me. But I just want her to -- she keep saying  
22 empowering me, but never actually authorize and let  
23 people know that's what she planning to do. So I want  
24 her to -- I just want to be sure that she would tell  
25 Liliana that what her plan was.

1 you would coordinate with Liliana for other things  
2 that needed to be done in the department?

3 A Well, by the time Liliana start working, we  
4 had already changed the supervisor. That -- Amanda  
5 left in January of 2014. I think it's the first part  
6 of 2000 -- January 2014. And we do not have any  
7 manager until March I believe, so I was the interim  
8 manager and supervise her.

9 Q Who were you supervising in the interim?

10 A Liliana.

11 Q That was your -- the only person you were  
12 supervising?

13 A That's the only person. She was doing -- if  
14 she was there. Cherri already moved to the leadership  
15 training. She's not doing the same thing, what we do.

16 Q Who told you in Market America that you were  
17 the interim supervisor during that time from January  
18 to March of 2014?

19 A I take the responsibility myself because  
20 everybody was contact me if they have any training  
21 issues or training requirements.

22 Q Okay. And then at some point Colbert  
23 Trotter was hired, correct?

24 A Yeah. March maybe.

25 Q All right. And Colbert became your direct



1           A     Yes, I -- I saw that.

2           Q     Do you have any reason to disagree with that  
3     date?

4           A     I thought I remembered March, but if -- if  
5     -- that's what she say there.

6           Q     Okay. And then it has the -- her kind of  
7     leaving date or last month as November 2016. Does  
8     that sound correct?

9           A     Yes. November, yes.

10          Q     Okay. All right. Okay. Now, we talked  
11     about your fellow, like, coworkers' ages. Do you know  
12     exactly how old Colbert Trotter was?

13          A     No. I would say late 40 to early 50.  
14     That's my guessing. The -- the information that she  
15     gave me, like, how old is her daughter and that -- all  
16     that type of thing, that -- that's my guess.

17          Q     Okay. She didn't talk to you about when she  
18     graduated college or anything like that?

19          A     I -- I don't recall.

20          Q     Okay. Did Colbert Trotter tell you  
21     specifically the reason that she was promoting Liliana  
22     to a manager role?

23          A     No, not specifically. I -- I questioned her  
24     and she told me that she was promoted I would say  
25     August 2016. She called me to her room and say that

1 Liliana was -- I'm sorry, there's a phone call. Can  
2 -- can I take this?

3 MS. DEBOARD: We can go off the record for a  
4 second if you need to.

5 [Recess from 10:59 a.m. to 11:00 a.m.]

6 Q [By Ms. DeBoard] Okay. So your  
7 conversations with Colbert Trotter about Liliana  
8 becoming a manager, when you -- actually, when you  
9 said you questioned Ms. Trotter about that, what  
10 exactly were you asking?

11 A I was asking why I was demoted.

12 Q Why did you believe that it was a demotion?

13 A Because she was a subordinate of me. And  
14 then I would report to Colbert at the time. Now, I  
15 had demoted to report to Liliana.

16 Q Who -- who told -- did anyone tell you that  
17 was a demotion?

18 A No, nobody. But the fact is when I report  
19 to a director before, now I have to report to a  
20 manager, don't you think that's a demotion? Well, I  
21 would assume that's a demotion.

22 Q What did Colbert Trotter say when you  
23 approached her about this?

24 A She say, "No, no, no. I know what to do."

25 Q And what did she mean by that?

1 Liliana because she was -- the title-wise, she is a  
2 training specialist. I was a trainer already. And  
3 later on, I became a senior trainer and she's still a  
4 trainer. So I always had the higher rank than she is  
5 -- she was.

6 Q When -- at that point -- so at that point  
7 did you ever give a performance review to Liliana?

8 A No, I had not.

9 Q Okay. Did you have authority to give a  
10 written performance review to Liliana?

11 A No, I -- I do not.

12 Q Okay. Do you know whether Colbert Trotter  
13 gave a performance review to Liliana in 2016?

14 A I assume. I didn't see her review, so I  
15 don't know.

16 Q Okay. So at some point Colbert Trotter was  
17 moved from training manager to director, right?

18 A Oh, correct.

19 Q Okay. And then so there was an open space  
20 for training manager, right?

21 A Yes.

22 Q All right. And that was the space that  
23 Liliana filled?

24 A That space, she told me through my -- April  
25 -- I think it's April 2016 -- I asked her that since

1 she already become a director, whether or not she need  
2 a manager position. And she say, no, she's not  
3 planning to have a manager.

4 Q Okay. At that time in April?

5 A April of 2016. I cannot say exact time  
6 because I remember that's a conversation when we have  
7 an evaluation. And that evaluation happened April of  
8 2016, so I assume that's -- that's the date.

9 Q Okay. And then in August of 2016 is when  
10 you were told about Liliana moving into a management  
11 role?

12 A Correct.

13 Q All right. In that conversation with  
14 Colbert Trotter where you were informed about Liliana  
15 going into a management role, did you specifically ask  
16 her whether that was based on Liliana's age?

17 A Not at the first -- that meeting till she  
18 informed me. The way she's doing it is -- well,  
19 anyway, she called me to her office and tell me that  
20 Liliana being promoted. And that's end of the  
21 conversation. I bring this up because I was keep --  
22 that keep bothering me. And I had a lot of sleepless  
23 night and just trying to figure out what's going on.  
24 So I went back to her and asked her why this happened  
25 and why I'm being demoted.

1 Q And what was Colbert Trotter's response when  
2 you asked that?

3 A I did specifically ask her is that because  
4 she -- she like to promote young people and for them  
5 to advance in -- for their career and also was my race  
6 playing a part. And she say, "No, no, no. I know  
7 what to do."

8 Q Okay. So in response to the question about  
9 is it because of my age, Colbert Trotter said no?

10 A That's what she say, "No, no, no."

11 Q And then in response to the question is this  
12 because of my race or because me, as Nadine Lee, I'm  
13 -- I am of Asian -- you know, Asian origin, Colbert  
14 Trotter --

15 A Uh-huh.

16 Q -- said no?

17 A She say, "No, no, no. I know what to do."  
18 That -- that's what I remember, how she replied.

19 Q Okay.

20 A If there's any other conversations or  
21 wording in there, I -- I can't -- I -- I don't recall.

22 Q Okay. And so what -- what did she do as a  
23 result. She said, "I know what to do." What did that  
24 mean?

25 A She changed my title from the -- the senior



1 that would be Colbert.

2 Q Okay. So Colbert assigned her to do the  
3 Market -- Market Mexico training and opening?

4 A Yes. I -- I will agree with that.

5 Q Okay. Were you assigning trainings to  
6 Liliana at that point when Colbert was there, so  
7 before -- like between February '14 and August of  
8 2016?

9 A When -- I believe that -- I cannot remember  
10 that correctly, but I believe the second training that  
11 she -- Liliana was doing, that's when I assigned to  
12 her. I'm not sure if Colbert is there yet for the  
13 second training that -- that Liliana did.

14 Q Okay. So you were mainly involved with  
15 Liliana's training of how to be a training specialist?

16 A Say that again?

17 Q You were mainly involved with kind of  
18 coaching and helping Liliana in the beginning stages  
19 of her employment?

20 A Yeah, I will say that.

21 Q Okay. And then once Colbert Trotter got  
22 there, Colbert was giving assignments to Liliana?

23 A Correct.

24 Q Okay. And then Liliana was taken from  
25 training specialist and moved to manager?

1 A She had a couple promotions in between.

2 Q Okay. Tell me your under -- just your  
3 understanding of what Liliana's promotions were in  
4 between?

5 A She start from training specialist, then  
6 trainer, and senior trainer, and manager.

7 Q Okay. Before she became manager, did you  
8 have any issues with Liliana's treatment of you  
9 personally?

10 A No. I just know that she was -- you know,  
11 refer the culture issues of Asians, so I aware she's  
12 -- she's not very fond with Asians.

13 Q Did she ever treat you differently than non-  
14 Asian workers before she was a manager?

15 A She was very fond with Henri. She  
16 handpicked Henri, and -- well, she -- she -- when we  
17 had that opening for Henri, she actually go Henri and  
18 tell her that apply this position, we will hire you.  
19 And that I did talk to Cherri about it, saying was  
20 that a proper thing to do, but we didn't say anything.

21 Q Okay. Why did you talk to Cherri about it?

22 A Because Henri was going around -- I heard  
23 from somebody that Henri was going around saying,  
24 well, I'm moving to training because Liliana say that  
25 she is going to train her -- train him to become a

1 one of my job responsibility. And she say she doesn't  
2 like that. She want me to share that with Henri. I  
3 didn't say much about it at the time because she just  
4 inform me that she was my boss. And I did not hear  
5 from anybody else, so I went to talk to Sherry and  
6 just to confirm if this is what happened. And why am  
7 I being demoted again since we were all report to  
8 Colbert when she left. Now I'm being demoted again  
9 under Liliana. And she say that, yes, this is what  
10 happened. Marc decide that. And I share my concern.  
11 I say why is that because my two -- well, it's,  
12 basically, the same conversation with Colbert.

13 Q Did your pay change when you started to  
14 report to Liliana?

15 A Did my what change?

16 Q Did your -- did your money -- your income --  
17 change when you started to report to Liliana?

18 A No.

19 Q Did your title change when you started to  
20 report to Liliana as your manager?

21 A No.

22 Q Why did you -- did someone tell you that it  
23 was a demotion to report to Liliana?

24 A Well, to me it was because, you know, when  
25 you report to a -- a director and now you do -- you



1 report to a manager, that is a demotion.

2 Q Okay. So that -- that's you. Did anyone,  
3 outside of yourself, tell you it was a demotion to  
4 report to Liliana Camara as a manager?

5 A No.

6 Q So it's just something you felt? You did  
7 not want to report to Liliana?

8 A It's not I don't wanted to report to  
9 Liliana. I -- I think that's why should -- just like  
10 when she was first promoted, I should have opportunity  
11 to seek the position. And there is no post, nothing.  
12 And give me the opportunity to seek the position.

13 Q Okay. Did you -- did you say that to anyone  
14 -- or the individuals who told you Liliana was getting  
15 the manager position, like Colbert Trotter?

16 A I said it to Colbert I was telling you  
17 earlier.

18 Q Did you report that to Sherry Spesock at any  
19 point before December 2016?

20 A What do you mean?

21 Q Did you talk --

22 A Not work -- not work related because when  
23 Colbert left, that -- she told us that she already  
24 arrange with Sherry and all three of us would report  
25 to Sherry.

1 -- Liliana and I meet, I tell her that I had talked to  
2 Sherry about the job responsibility and that's what  
3 Sherry told me.

4 Q Okay. And --

5 A And -- and she bring up that the -- the  
6 training that she want me to rotate with Henri. And  
7 she told me that I should allow young people to have  
8 opportunity to build their network. So MPCP is a very  
9 -- because MPCP -- well, she -- everybody -- whoever  
10 on the Colbert label. So anybody from different  
11 department can come to that class. It's not only for  
12 distributor services. And she want Henri to have that  
13 opportunity to grow up his network and give him  
14 opportunity to advance. So I was telling her that I  
15 have a concern that she -- he is not familiar with the  
16 -- the training. And I'm willing to teach him and  
17 supervise him afterwards until he can come up to  
18 speed. And that make Liliana quite unhappy because  
19 she start to attack me. She said something that I --  
20 I'm -- I will not dictate this program. I don't want  
21 to give up the -- the training. I don't want -- I  
22 don't have a teamwork mentality. I'm not a team  
23 player because I don't want to share that  
24 responsibility with Henri. And I explained to her  
25 that's not what I'm saying. I say that once he can

1 get up to speed, I have no problem that -- sharing  
2 responsibility, but still I want to supervise him  
3 because that -- I am responsible for that program.  
4 And she start to say that I wouldn't listen to my  
5 former boss. So I -- I -- I start to aware he --  
6 she's attacking me. And so I replied to her that's  
7 not to true. I'm sorry I get a little emotional every  
8 time I talk about this. She was -- she start  
9 attacking me and told me that I never listen to my  
10 former boss. And I was asking her, "Why are you  
11 saying that? That's not true." And she said -- and I  
12 explained to her that if -- if that's the case, I  
13 won't stay -- I won't be at Market America for that  
14 long. You know -- you know, if you don't listen to  
15 your boss, you probably got fired long time ago. So  
16 what you say is not true. And then after that, she  
17 was telling me -- I -- I'm sorry, I lost my thought a  
18 little. Oh, the next thing she come up with was that  
19 I was dumping work to her when she start work at  
20 Market America. And I'm kind of puzzled what she was  
21 talking about. And she starts saying remember that  
22 when you -- when I start, and the six weeks of  
23 training was most time-consuming, and by the time you  
24 supposed my -- your turn, I didn't -- I didn't do it.  
25 So I have to explain to her what happened back then.

1 led to that.

2 A She told me that there's a request for  
3 training the -- on franchises services new hire  
4 training, which we established that during January 3rd  
5 meeting that belonged to Henri. And she want me to do  
6 that training, you know, at Jan -- at -- that start at  
7 January. And that's a third-shift training that she  
8 want me to do.

9 Q So she --

10 A And I --

11 Q -- wanted you to do that and not Henri?

12 A Yes, she did. She said that it's -- there  
13 is a new hire for Mandarin speaking and she need my  
14 help. And I did agree that I will help. And I say  
15 sure. We don't have that type of training, so called  
16 Mandarin, our franchise service training before. If I  
17 want -- I -- I have to recall one that is back to  
18 2005. That's when we started -- the first time we  
19 start to -- the -- the Market Taiwan. But after that,  
20 we never had that so-called Mandarin on franchise  
21 services training. So that's a new training that she  
22 come up with. And she want me to do that entry-level  
23 training because there is a Mandarin speaking, you  
24 know.

25 Q And did you do that training in Mandarin?

1           A     Yes, I did.

2           Q     Okay. Did you -- did you report any  
3 complaints of you having to do that training to anyone  
4 else?

5           A     I did not because Sherry and Liliana was  
6 together and say I have to do it.

7           Q     So did you talk to Sherry about that --  
8 about doing that entry-level training?

9           A     No. When I -- when I was called to Sherry's  
10 office, I know that, you know, Sherry is involved in  
11 this and trying to diminish my role within the  
12 department.

13          Q     Why -- so why is taking on an extra training  
14 diminishing your role?

15          A     Because that's an entry-level training. I  
16 have not done that I would say at least, maybe, five,  
17 six years.

18          Q     Okay. So you felt that that training was  
19 kind of beneath your qualifications?

20          A     Yes. I had take care of -- I -- I believe I  
21 had send you a job responsibility that -- that I -- I  
22 had -- we have established on January 3rd.

23          Q     Okay. That -- so that job responsibilities  
24 document, was that -- did you make that from memory or  
25 was that based on notes?



1 Q Okay. What about three and four? Just  
2 review those and let me know if there is anything that  
3 is -- or if these are kind of accurate based on what  
4 we've been discussing today in your memory.

5 A Number 3 is right. I did ask for new  
6 Mandarin training -- trainers because that -- if  
7 that's the -- it become regular that they want to  
8 offer Mandarin training, then -- then they should hire  
9 another one. Number 4, yeah, that -- that is what I  
10 was talking about they called me to they office and  
11 say I have to do this training. I -- I agree to do  
12 that training during February's meeting already. I  
13 didn't say that I don't want to do it. I just suggest  
14 her that she need to hire one more trainer if this  
15 become regular. And -- but I got called in there and  
16 being demand to do this training, I was kind, well, I  
17 already agreed to why you -- you know, I was being  
18 called there and demand to do that. That's Number 4.

19 Q Okay. What about five, six, and seven, are  
20 those all true and accurate?

21 A Five I cannot recall exact time. It may be  
22 off a little. I cannot recall exact time. I  
23 remembered 27, so that's what I put in February. It  
24 may be, you know, later. I cannot recall exactly the  
25 time frame of that. Number -- Number 6 is what we

1 were talking about, the evaluation earlier that -- I  
2 don't know who did that, but Sherry did -- Sherry did  
3 tell me that -- that done the review herself.

4 Q Did you record that conversation with Sherry  
5 about your pay increase?

6 A No.

7 Q Why not?

8 A Because I -- I was called to her office  
9 without knowing what it was about.

10 Q Okay. In April or May of 2017, were -- was  
11 the Spain Market and Mexico Market still open?

12 A I believe so, yes. And she has a post --  
13 that post in the break room. And she specifically say  
14 she want to hire a Spanish-speaking trainer. Can you  
15 scroll up? I was not able to see the -- can I look at  
16 seven again?

17 Q Here you go.

18 A And when she post that and say that she want  
19 to hire a Spanish-speaking training specialist, I then  
20 went to suggest to her maybe we need to -- to have  
21 Mandarin-speaking trainers or specialists since she  
22 had want to do an entry-level Mandarin speaking  
23 training which lasts -- lasts a few weeks.

24 Q And what did she say in response?

25 A She said that's what she need and just --

1 we did for years.

2 Q Okay. And then you put in here new hires  
3 without certain English capability will have  
4 tremendous hardship to perform their job. Is it your  
5 opinion --

6 A Correct.

7 Q -- if they didn't speak English they  
8 probably weren't qualified for the -- the job that  
9 they were hired for?

10 A It's not my opinion. It's our material and  
11 also all the systems and when they have to do the  
12 paperwork and -- with any correction for the system,  
13 everybody is using English. So if they don't  
14 understand English, they were not able to perform that  
15 job. There is no Mandarin system for them to use when  
16 they're performing jobs.

17 Q Okay. What about 11; is that accurate?

18 A Yeah. I believe that I received an e-mail  
19 from Brandy saying that new hire, there's only one  
20 person. Liliana want me to do a Mandarin speaking for  
21 her, and I suggest to Brandy at the previous one. And  
22 then later Brandy e-mailed me saying this person has  
23 50 percent English -- English capability, so she can  
24 communicate and talk to the customer, yes. This is  
25 correct. Again, I'm not going to say 100 percent



1 because of that time. I cannot recall exact time I  
2 have.

3 Q Okay. So I'm kind of a little confused.  
4 What's the importance of this Number 11? What's the  
5 importance of this?

6 A I just want to establish that the Mandarin  
7 speaking class that she asked me to do, this person  
8 actually can speak English. It's not that she cannot  
9 speak English then have to have a Mandarin-speaking  
10 class.

11 Q Okay. Was there only one person in the  
12 training class?

13 A Yes. Only one person that she want me to  
14 train, but there's another class that Henri is doing  
15 later. This person could join Henri's class, which is  
16 English speaking. And I offer help and tell Brandy  
17 that I can help her. Just like before, I can help  
18 her. When she finish the English class, then I will  
19 be able to help her with a couple weeks, just like I  
20 described to you earlier that for one or two hour a  
21 day and bring her -- fill in the gap that she missed  
22 for -- from English.

23 Q Okay. Is Brandy -- was she the -- she was a  
24 new director; is that correct?

25 A Yeah. She was there probably less than half